Remarks

Claims 9, 22-26, and 30 have been canceled. Claims 1-8, 10-11, and 13-14 have been amended. New claims 31-37 have been added. Therefore, claims 1-8, 10-21, 27-29, and 31-37 remain in the application. Please reconsider the application in view of the foregoing amendments and following remarks:

Patentability of Claims 1-8, 10-21, 27-29, and 31-37 over Sim

The Office Action rejects claims 1-21 and 27-29 as being unpatentable under 35 U.S.C. §102(e) over Sim, U.S. Patent No. 6,213,880 ("Sim"). The Applicants respectfully traverse this rejection. For a 102(e) rejection to be proper, the cited art must show each and every element as set forth in a claim. (*See* MPEP § 2131.)

Amended claim 1 is directed to a system for mapping an input device's controls to interact with an application and recites in part, "an action-control setup interface . . . wherein upon an initial configuration of the application, the application calls the action-control setup interface with an input parameter comprising a data structure of the set of actions and the application genre, wherein the action-control setup interface associates the set of actions in the data structure to the plurality of controls of the user input device based on the semantics of the application genre." Sim fails to teach or suggest at least this feature of claim 1.

The Office Action asserts that Sim teaches among other things "an API that receives calls from the application." (Action at ¶ 3). Applicants respectfully disagree. For example, the Office Action asserts the following passage:

> A pointer for the data structure is used to keep track of the multiple button keymapping of the game pad 100. The structure information is saved as bin format in the keymap files 362. Once the translator module 368 and the keymap files 362 are stored in memory, the game pad 100 is able to control any application module 366 using the DirectInput interface 430. In the preferred embodiment, after installation of the translator module 368, an icon is shown in the Windows Taskbar to indicate that the translator module 368 is in operation. Other computer systems 110 and architectures may also be used in accordance with the present invention, as the interaction between the operating system 354 and the device drivers 358 is not critical to the operation of the present invention. (Sim, col. 6, lines 15-25.)

Applicants respectfully submit that the passage cited by the examiner fails to teach or suggest "upon an initial configuration of the application, the application calls the action-control setup interface with an input parameter comprising a data structure of the set of actions and the application genre, wherein the action-control setup interface associates the set of actions in the data structure to the plurality of controls of the user input device based on the semantics of the application genre." Instead, Sim presents an example of a problem overcome by the claimed arrangement. For example, Sim states

> [T]he **user 340 must activate** 500 the **keyset module** 364. The module 364 then displays 504 a list of keymap files 362 to edit and an option to create a new keymap file 362. A table 370 containing the names of the keymap files 362 is located on disk 316, and is accessed to create the list. The system determines 508 if the create new keymap file option is selected. If the create new keymap file option is chosen, then a window allowing the user 340 to search for one of the application modules 366 is created 512. The **user 340 selects an application module** 366 to be controlled by the game pad 100, and the keyset module 364 receives 516 the input. A new row on the table 370 is created, with the identification of the application module 366 stored as an entry. (emphasis added, Sim, col. 6, lines 34-48.)

Sim requires a user to activate the keyset module and to select an application module to be controlled by the game pad. The application module does not call the keyset module to create a new keymap file. User intervention directs the keyset module to create the initial assignment of a keymap file. Even when a user uses the predefined mouse keymap files, the user is required to "assign this mouse emulation keymap file to the application module" before keymapping takes place. (Sim, col. 7, lines 35-40). Moreover, Sim is clear that the "keyset module" that allows the user to create the keymap-to-application assignment is not the "application module" (col. 6, lines 36-37, 45-46, and Figure 3, items 364 and 366). The application module does not call the keyset module to create a new keymap file.

Therefore, the Sim arrangement does not teach or suggest "upon an initial configuration of the application, the application calls the action-control setup interface." Further, Sim does not teach "associate[ing] the set of actions in the data structure to the plurality of controls of the user input device based on the semantics of the application genre" as recited in claim 1.

Therefore, claim 1 should now be in condition for allowance. Claims 2-8 and 10-21, which depend on claim 1, should be allowable for at least the same reasons, as well as the respective features recited therein.

Claim 27 recites "in response to a request from an application program to create an action-to-control mapping, generating a structure . . . and using the generated structure to create an association between the action values defined by the application and the controls on the input device . . ." For reasons similar to those described above, claim 27 should be in condition for allowance. Claims 28-29, which depend on claim 27, should be allowable for at least the same reason.

Claim 31 recites "receiving a call from the application to create an initial configuration that associates actions corresponding to application commands to controls on a user input device . . . " For reasons similar to those described above, claim 31 should be in condition for allowance. Claims 32-37, which depend on claim 27, should be allowable for at least the same reason.

Conclusion

The claims in their present form should now be allowable. Such action is respectfully requested.

Respectfully submitted,

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